

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano	:	
	:	
	:	
v.	:	Civil Action No. 22-cv-00326-LM
	:	
The City of Nashua, et al.	:	
	:	

**ASSENTED-TO MOTION TO EXTEND TIME TO REPLY TO PLAINTIFF'S
OBJECTION TO DEFENDANT CARIGNAN'S MOTION FOR JUDGMENT ON THE
PLEADINGS**

NOW COMES Defendant Michael Carignan and respectfully files this Assented-to Motion to Extend the Deadline to Reply to Plaintiff's Objection to Defendant Carignan's Motion for Judgment on the Pleadings [Doc. No. 39].from January 6, 2023, to January 13, 2023. In support thereof Defendant states as follows::

1. Defendant filed a Motion for Judgment on the Pleadings [Doc No. 36] on December 16, 2022.
2. Plaintiff filed an Objection to this Motion [Doc. No. 37] on December 30, 2022, later replaced with a filing on January 3, 2023 [Doc. No. 39]. The Memorandum of Law supporting the Objection is 23 pages and includes affidavits and numerous exhibits.
3. Based on the date of the original filing [Doc. No. 37], a Reply is due on or before January 6, 2023.
4. Counsel needs additional time to file a substantive response and therefor seeks an extension of seven (7) days of this filing deadline to allow the Reply to be filed by Friday, January 13, 2023.
5. The extension will not require continuation of any other pending deadlines or hearings in this matter.

6. Plaintiff's counsel has kindly assented to this Motion.

WHEREFORE, Defendant respectfully requests that this Court:

- A. Extend Defendant's deadline to Reply to January 13, 2023; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

MICHAEL CARIGNAN

By his attorneys

CULLEN COLLIMORE SHIRLEY PLLC

Dated: January 6, 2023

By: /s/ Brian J.S. Cullen

Brian J. S. Cullen (Bar No. 11265)
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: January 6, 2023

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen